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October 4, 2024

Via ECF

The Honorable Naomi R. Buchwald
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: ***Cequel Communications, LLC d/b/a Suddenlink Communications v. Mox Networks, LLC, No. 21-cv-5577***

Dear Judge Buchwald:

Counsel for Plaintiff, Cequel Communications, LLC d/b/a Suddenlink Communications, and for Defendant, MOX Networks, LLC (together, the “Parties”) jointly write to respectfully request an extension of the deadline to file a proposed schedule for the resolution of the outstanding claims in this matter. On August 23, 2024, the Court issued a Memorandum and Order (the “August 23 Order”) granting Plaintiff’s motion for summary judgment on its first three claims for breach of contract and denying Defendant’s cross-motion for partial summary judgment. *See* ECF No. 88. The Court directed the Parties, if unable to resolve the remaining claims, to file a proposed schedule for their resolution within 45 days of the August 23 Order. *Id.* Thus, the deadline to file such proposed schedule is October 7, 2024.

Since the August 23 Order, the Parties have engaged in good faith negotiations in efforts to resolve the remaining claims. The negotiations are ongoing, and the Parties believe that a short extension would be productive. Accordingly, the Parties respectfully request to extend the deadline to file a proposed schedule for resolving the remaining claims by two weeks, to October 21, 2024. This is the Parties’ first request for an extension of this deadline and this request does not affect any other scheduled dates.

Thank you for Your Honor's attention to this matter.

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By: /s/ Avni P. Patel

By: /s/ Marsha J. Indych

Avni P. Patel
Attorneys for Plaintiff

Marsha J. Indych
Attorneys for Defendant

Application granted.

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: October 7, 2024
New York, New York